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6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 **-oOo-**

10 UNITED STATES OF AMERICA,) 2:11-cr-0310-JCM-RJJ
11)
12) JOINT PROTECTIVE ORDER RE:
13) VIDEO RECORDINGS OF UNDERCOVER
14) TRANSACTIONS (AMENDED TO ADD
15) ATTORNEY GABRIEL GRASSO)
16)
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Defendants)

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The parties having met and conferred regarding the content of video recordings to be released as supplemental discovery in this matter, hereby agree that the Government, upon this Court's approval of this Protective Order, will release to undersigned defense counsel within ten (10) days, supplemental discovery including video recordings of controlled purchases of marijuana by undercover agents.

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26)
By signing this Protective Order, defense counsel agree that the above-referenced materials will be maintained by their offices and associates in the strictest confidence. Access to these materials will be limited to counsel, defendants, investigators, paralegals, experts and other individuals who have been retained or appointed by the Court to represent the defendants, and who

1 will be provided a copy of this Order. Counsel further agree that these materials will not be copied
2 or publically disseminated (other than for use directly in court proceedings). Furthermore, copies of
3 the videos may not be provided directly to the individual Defendants, including the Defendants who
4 are parties to this agreement, until such time as the Government agrees to such disclosure and/or it
5 is ordered by the Court.

6 For parties who are not signatories to this agreement, copies of these materials will be
7 maintained at the United States Attorneys Office, where they have been made available for viewing.
8

9 Respectfully Submitted this 6th day of June, 2012.

10 DANIEL G. BOGDEN
11 United States Attorney

12 /s

13 Bradley W. Giles
Assistant United States Attorney

14 Dated: 5/31/12 /s
15 Michael Cristalli
16 Attorney for: Jacob Lill

17 Dated: 5/31/12 /s
18 Paola M. Armeni
19 Attorney for: Edmund Schrobback

20 Dated: 5/31/12 /s
21 Mace J. Yampolsky
22 Attorney for: Christopher Green

23 Dated: 5/31/12 /s
24 Karen Winckler
25 Attorney for: Kyle Lair

26 Dated: 6/6/12 /s
Gabriel Grasso
Attorney for: Ana Martinez

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA) 2:11-cr-0310-JCM-RJJ
9 Plaintiff,)
10 vs) PROTECTIVE ORDER RE: VIDEO
11 JACOB LILL;) RECORDINGS OF UNDERCOVER
12 EDMUND SCHROBACK;) TRANSACTIONS
13 CHRISTOPHER GREEN;)
14 KYLE LAIR; and)
15 ANA MARTINEZ)
Defendants)

Based on the pending stipulation of the parties, and good cause appearing therefore,

18 | IT IS HEREBY ORDERED that:

19 Ten days from the date of this Order, the Government shall release to signatory defense
20 counsel supplemental discovery including video recordings of controlled purchases of marijuana by
21 undercover agents.

22 | IT IS FURTHER ORDERED that:

23 The video recordings released pursuant to the supplemental discovery package shall
24 be maintained in the strictest confidence. Access to the recordings shall be limited to counsel,
25 defendants, investigators, paralegals, experts and other individuals who have been appointed by the
26 Court to represent the signatory defendants, and who shall be provided with a copy of this Order.

IT IS FURTHER ORDERED that:

While the Defendants may view the videos of these transactions, they shall not be provided with a copy of these materials. Furthermore, none of these materials may be publically displayed or disseminated, except when used in direction connection with legal proceedings before this Court. There shall be no further dissemination of these materials unless and until such time as the Government agrees to such disclosure and/or it is ordered by the Court.

DATED this 12 day of June, 2012.

UNITED STATES MAGISTRATE JUDGE